VLADECK, RASKIN & CLARK, P.C.

SUSAN J. WALSH 212.403.7348 swalsh@vladeck.com

Hon. Loretta A. Preska United States District Court Judge United States District Court for the SDNY 500 Pearl Street New York, NY 10007

Re: United States v. Daniel Lynch, 08 C5 1051 (LAP)

Dear Judge Preska:

February 12, 2021

The adjournment of the briefing schedule requested below is approved. SO ORDERED.

Dated: February 16, 2021

New York, New York

LORETTA A. PRESKA, U.S.D.J. briefing schedule in the above captioned matter

I write to request an adjournment of the current briefing schedule in the above captioned matter for an additional 60 days. This is the third request for an adjournment. It is made with my client's consent and the Government has no objection.

I was appointed as substitute counsel to assist Mr. Lynch concerning his pro se 18 U.S.C. § 2255 motion to vacate, set aside, or correct his sentence pursuant to the Criminal Justice Act. I am in contact by mail with my client who is incarcerated in Allenwood Penitentiary. The exchange of information by mail is particularly slow in recent months. My client would like to supplement his application with additional briefing however I will require additional time to do so.

Since the Government's response to the *pro se* motion is currently due on February 22, 2021, I write in advance to request additional time to avoid burdening the Court and the Government with additional briefing. I request that the Government's time to respond be adjourned until April 22, 2021 so it may be responsive to additional defense briefing.

Thank you for your time and consideration to this matter.

Respectfully submitted,

/s/ Susan J. Walsh Susan J. Walsh

cc: Kevin Mead, AUSA (by email and ECF)